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9 IAN FURMINGER

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 IAN FURMINGER, et al.,

17 Defendants.

Case No. CR-14-00102-CRB

**STIPULATION AND ORDER RE  
PRETRIAL FILING SCHEDULE**

## **STIPULATION**

**Whereas**, trial in the above-captioned case is set to commence on November 3, 2014.

**Whereas**, the parties have met and conferred regarding the pretrial filing schedule.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the parties, through their respective counsel of record, and respectfully requested that the Court adopt the following pretrial filing schedule:

<b>Date</b>	<b>Description</b>
May 9 <sup>th</sup>	Defense Motions to Sever, Motions for Discovery
May 23 <sup>rd</sup>	Government Opposition
May 30 <sup>th</sup>	Defense Reply
June 11 <sup>th</sup>	Motions Hearing Date
June 27 <sup>th</sup>	Defense Suppression Motions
July 8 <sup>th</sup>	Government Opposition
July 18 <sup>th</sup>	Defense Reply
July 30 <sup>th</sup>	Motions Hearing Date
August 4 <sup>th</sup>	Deadline for <i>Jencks</i> material that exists at that time.
August 15 <sup>th</sup>	The Government must fully comply with all requirements of Local Rule 16-1(c). The Government must disclose a summary of (i) any evidence of other crimes, wrongs, or acts that it intends to offer under Federal Rule of Evidence 404(b), and which is supported by documentary evidence or witness statements, and (ii) any co-conspirators statements the Government intends to offer under Federal Rule of Evidence 801(d)(2)(E). These disclosures must be set forth in sufficient detail that the Court may rule on the admissibility of the statement.
August 22 <sup>nd</sup>	All parties to make expert disclosures.
August 29 <sup>th</sup>	The Government must provide to defense counsel all <i>Henthorn</i> material on law enforcement witnesses whom the government anticipates calling.
September 4 <sup>th</sup>	Deadline for <i>Giglio</i> material that exists at that time.
September 12 <sup>th</sup>	All Non- <i>Jencks Brady</i> information must be disclosed to defense counsel.
September 15 <sup>th</sup>	Stipulated Jury Questionnaire Filed
September 19 <sup>th</sup>	<i>Daubert</i> motions by both sides. If filed, oppositions due 21 days later, replies 7 days later. Court to set hearing date.
September 26 <sup>th</sup>	Deadline for Witness Lists – all parties.
October 3 <sup>rd</sup>	Deadline for Exhibit Lists – all parties.
October 9 <sup>th</sup>	Deadline to file Motions to Exclude and Motions in Limine.
October 16 <sup>th</sup>	Deadline to file Oppositions to Motions to Exclude and Motions in Limine.

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MELINDA HAAG  
UNITED STATES ATTORNEY

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RAINS LUCIA STERN, PC

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BURKE LAW OFFICE

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